

(Comments in Bold Italics by L. Johnston to consultants for preparation of Specific Plan/EIR/EA. Note that the applicants have submitted a proposed Specific Plan – consultant is to utilize information from the submittal to create a Specific Plan for the County)

April 20, 2004

Larry Johnston
Mono County Planning Division
Re: Draft June Lake Rodeo Grounds Specific Plan DEIR
By hand and email

Dear Mr. Johnston:

Thank you for the opportunity to comment on the scoping for the subject DEIR.

Introduction

The Sierra Club Range of Light Group has reviewed the Rodeo Grounds Notice of Preparation and proposed Rodeo Grounds Specific Plan.

Any development in June Lake must preserve the unique scenery and rural atmosphere. The inclusion of urban and foreign, non-indigenous architecture and structures is entirely inappropriate and will detract from the economic viability of the community. ***(part of RFP is design peer review – also EIR to include Visual Resource analysis)***

While we do not object to development of the Rodeo Grounds property in accordance with the plans developed by the citizens, this proposal represents a substantial deviation from these plans, and will have substantially larger environmental impacts. ***(EIR consultant to study environmental impacts if present / propose mitigation if needed.)***

While the proposed plan pretends to comply with the existing General Plan and June Lake Specific Plan, it does not in fact do so. We think that this plan should not be accepted or approved by the county, because it is misleading and opposed by most residents. ***(N.A. – not a scoping comment)***

Because the proposal does not comply with the approved plans, and therefore should be denied, we believe that it will be to the proponent's advantage to withdraw and modify the plan at this time to avoid the cost and delay of environmental analysis of an unacceptable plan. ***(not a scoping comment. Applicant has right to apply – application includes GPA for up to 90' high – density appears to be in target range in June Lake Area Plan, 10 units per acre; doesn't mean it will be approved at that density. Consultant expected to provide in-depth, objective, fact-based informational document for decision makers)***

The following items in particular violate the General Plan and/ or the June Lake Specific Plan. These items appear to be inconsistent with analyses in previous EIRs.

- Visual impact.
- Building heights.
- Number of units. A duplex contains two units, not one.
- Parking.
- Snow storage.

(consultant to include analysis – many comments were submitted at the Scoping meeting along these lines)

We support the position of the June Lake Advocates, and incorporate their comments by reference in their entirety. *(see June Lake Advocates letter and my comments thereto)*

Impact Analyses Required

We ask for detailed analysis of the following impacts. We expect these analyses to be thorough and scientifically respectable, supported by substantial evidence.

Sierra Club Scoping Comments, Rodeo Grounds DEIR

Growth inducing impacts. The DEIR must estimate the impacts of growth induced by the project as well as those of the project itself. The DEIR must provide predictions of population and other growth and sprawl using accepted sprawl models, and suggest methods of preventing and mitigating such sprawl by conservation easements or other means. *(this is a standard part of EIRs)*

Cumulative impacts, including that of other developments and the June Mountain Expansion Plan. This analysis should include the projected cumulative impact of the June Mountain Expansion Plan and any induced growth. *(this is a standard part of EIRs)*

Visual Impact. It is hard to believe that 90-foot buildings are either necessary or will be invisible. The project should not be noticeable when viewed from Oh! Ridge. *(expect consultant to prepare comprehensive visual analysis complete with visual simulations from several different viewpoints, including night-time)*

Fire protection for high-rise and close-together buildings. If the county decides to allow buildings of greater height than allowed by the current plans, the impacts on personnel training, equipment and other facilities must be evaluated in detail. *(one of the primary issues – consultant to analyze)*

Snow storage (building setbacks and separations). The present plans clearly do not provide inadequate snow storage. An independent analysis of snow storage and disposal is needed. Reliance on snow removal, as opposed to storage, raises costs to the homeowners and the county and should be considered unacceptable. Inadequate access for snow removal implies that residents may be trapped without emergency access. The **100-year snowstorm** should be used as a worst case. *(I think they mean “adequate” not*

“inadequate snow” storage...maybe contact writer to obtain the study or basis that allowed them to conclude “plans clearly do not provide inadequate (sic) now (sic) storage.” Maybe their analysis could be used by an independent analyzer to determine actual snow storage requirements. 100 year storm is not the norm – consultant to contact public works/water board.)

Transportation, circulation, and traffic. The DEIR needs to provide a credible analysis of all vehicle traffic, including that induced by increased visitation and growth. This estimate needs to include the service vehicles required for deliveries, snow clearance, and snow grooming, because of their high particulate emissions which contribute to the PM-10 burden. *(expect consultant to include detailed traffic analysis; air quality analysis to consider PM –10 emissions from all sources, including road cinders used for traction)*

Parking. The proposal does not appear to meet county standards for parking. The idea that visitors will come by air instead of by car has been used in the past as an excuse to reduce parking provisions in some projects. Because there is no evidence that air travel ever has or ever will contribute significantly to visitation in Mono County, parking standards must be enforced. Similarly, traffic estimates must take account of the arrival of visitors by car or bus. *(not sure how they conclude parking standards aren’t met; again, maybe contact writer to obtain their analysis and utilize in our independent analysis by consultant; at any rate, include a good parking analysis – see also note above)*

Added water in accordance with SB 221. The draft plan must be more specific as to the sources of water. Analysis must prove, not merely state, the existence of sufficient water without significantly affecting stream flows, lake levels, wetlands, or groundwater. Proponent is bound by the standards of SB 221, which requires proof of water resources before the project can be approved. Developer impact fees must be assessed for any needed increase in infrastructure. *(SB610/SB221 Water Assessment is a major work task outlined in RFP)*

Groundwater impacts. Aquifer characteristics are unknown in the June Lake area. A complete hydrogeological study must be done and realistic projections of recharge be done for drought, normal and wet years for 20 year forecasts. If groundwater pumping is used as a source of water, the depletion of the resource must be quantitatively estimated. Stormwater runoff from paved surfaces and roofs will infiltrate groundwater recharge. A first flush of pollutants has been seen from inclined tile and inclined polyester roofs and corrosion of drains released copper in sufficient quantities to potentially damage the groundwater and surface receiving waters has been noted by recent research. *(include in SB610/SB221 analysis – groundwater analysis must be included – water quality analysis to be included in EIR)*

Stormwater drainage. Triad's drainage study uses peak runoff estimates for the 20 year, 1 hour rainfall event. Many recent studies have shown that design storm characteristics have changed in the last 40 years. For a project of this size, with the potential of increasing sediment loads to Gull Lake and downstream at Silver Lake, a more rigorous

approach should be considered In the alternatives. The number of times the design storm rainfall amounts have been exceeded should be Identified and Incremental differences between the 20 year, 25 year, 50 year and 100 year event must be considered In the EIR. Using the guidelines from the Mammoth Storm Drainage Design Manual Is not justified as a conservative approach, since most rainfall events are due to thunderstorms, not storm track or topographic affects. ***(consult public works/water board)***

Stormwater quality. Impacts must be Identified for the following components: litter, micro-organisms, toxicity, heavy metals and particle size and settling. ***(include analysis)***

Sewage. The impact of the maximum P AOT on the sewage system infrastructure must be estimated. Developer impact fees must be assessed for any needed increase in infrastructure. ***(include analysis- contact PUD; County can not impose fees for PUD, if analysis proves need for impact fee.)***

Other required additions to infrastructure. The DEIR should identify any otehr required additions to infrastructure and provide estimaes of their scope. Developer impact fees must be assessed for any other needed increase in infrastructure. ***(if required by mitigation analysis, fees may be imposed; PUD and Fire District are independent of County – work with these entities, essential. Nexus to project impact must be clear - County does not now have DIFs in place)***

Water Quality The DEIR must consider the effects of runoff and use of toxic, materials (herbicides, pesticides, fuel) on local stream water and groundwater. ***(include analysis)***

Air Quality and Cumulative Emissions - The DEIR needs to compute the cumulative emission, not only from the project, but also from the effects of increased visitation and growth within the Loop and any other affected communities, including those whose populations will increase as a result of employees forced to move there by high housing prices. Sources should include, but are not necessarily limited to:

Construction activities.

- Fueling emissions, including averaged spills
- Existing and increased traffic on US 395 and SR 158 (more deliveries, more local traffic).
- Increased traffic, wood burning and propane use, snow removal and service vehicle use and other emissions in the Loop and nerry towns as a result of increased visitation and growth. .
- Use of volcanic ash and other dust generators on snowy roads for traction.

Mitigations considered should include conversion of the private and public diesel service fleet to propane, and the immediate replacement of all woodstoves not conforming to EPA regulations, together with adequate insulation of rental units. Many employees are forced to live in poorly insulated buildings with no central heating. Complete elimination of woodstoves is not a practical possibility, and so a program of stove replacement and insulation may need to be established, perhaps

financed by county loans to landlords. *(include analysis – some of this appears speculative but should be considered if data is available to support)*

Toxic Emissions. The DEIR should contain an estimate of toxic emissions resulting from increased visitation, and growth. *(include analysis)*

Impact on schools (see SB 221). The DEIR must estimate the number of additional students who must be served by the local school system, resulting from the project and attendant growth, and provide an estimate of facilities upgrades needed (new schools, new buses). *(SB221 is water, not schools. There is no school in JL – students go to Lee Vining, unless inter-district transfer to Mammoth Lake – include analysis.)*

Solid and Hazardous Waste. The DEIR should include the effects of the project and its induced growth on the production of waste. *(include analysis)*

Impact on local recreation resources such as trails, beaches and campgrounds. The DEIR must quantify the impact on local recreational areas, including beaches, trails, campgrounds and natural and wilderness areas as a result of the project and its induced growth. *(include analysis)*

Wildlife, including threatened and endangered species. The DEIR must provide a complete analysis of the impact on wildlife in the Loop and other nearby areas. *(SOP -include analysis)*

Historic, architectural, archaeological, and cultural resources. Additional visitors will certainly not spend all their time at the project. The Area of Potential Effect needs to cover the area from Mono Lake to Tom's Place, including the canyons served by roads and trails. There are, for example, numerous petroglyphs in the region that have suffered heavily from illegal removal by visitors. The Paiute tribe needs to be made aware that the proposed visitation will affect the entire area, including many of their ancient cultural areas. *(interesting point – discuss with appropriate agencies on scope. Rodeo Grounds was traded from INF with archaeological review – re-visit assessment/consider what area of potential effect might be)*

Energy and Natural Resources. The DEIR needs to consider the impact on energy needs throughout the region as a result of the project and increased visitation and growth. Added impacts include the addition of facilities and services by resource providers. The conservation measures needed to improve air quality will influence energy needs. *(again, scope is question; consult with agencies, otherwise SOP)*

Light Emissions. Light emission is a serious problem in the area and will be worsened by increased visitation and growth. The DEIR should evaluate the effects of growth on light emissions in the region (see note above – include visual simulations at night)

Conclusion We hope that the proponents will provide sufficient analysis to assuage the concerns expressed above. *(County is responsible for objective environmental analysis – not proponents. Consultant to work with County and other agencies to ascertain environmental impacts; provide good document to decision makers)*

Thank you for your attention to our comments.

Sincerely,

~ ~?; c~ /

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Vice-Chair, Range of Light Group

Toiyabe Chapter, Sierra Club

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(writer has provided good scoping comments, please consider carefully)